

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION

ORDER No. 00-108

NPDES PERMIT NO. CA0037842

AMENDING WASTE DISCHARGE REQUIREMENTS, ORDER NO. 98-052, FOR:

CITIES OF SAN JOSE AND SANTA CLARA
SAN JOSE/SANTA CLARA WATER POLLUTION CONTROL PLANT

SAN JOSE
SANTA CLARA COUNTY

The California Regional Water Quality Control Board, San Francisco Bay Region (hereinafter called the Regional Board) finds that:

1. The San Jose/Santa Clara Water Pollution Control Plant (hereinafter the Discharger) submitted a request dated August 9, 2000 for an amendment to Order No. No. 98-052 for discharge of recycled water to Coyote Creek for aquatic habitat enhancement (streamflow augmentation).

BACKGROUND

2. The Discharger owns and operates the San Jose/Santa Clara Water Pollution Control Plant (Plant) located at 700 Los Esteros Road, San Jose, Santa Clara County, California. The Plant provides advanced secondary treatment of wastewater from domestic, commercial and industrial sources within the City of San Jose, City of Santa Clara, City of Milpitas, West Valley Sanitation District, Cupertino Sanitation District, Burbank Sanitary District, Sunol Sanitary District and Sanitation District 2-3. The Discharger's current service area has a population of approximately 1.5 million.
3. The Plant provides screening and grit removal, primary sedimentation, secondary (biological removal) treatment, nitrification, filtration, chlorination, and dechlorination. Effluent design recycling, including streamflow augmentation, is not dechlorinated prior to distribution. Additional chlorine is added to meet Title 22 requirements. Recycled water used for streamflow augmentation is dechlorinated using sodium bisulfite.
4. In 1990, the State Water Resources Control Board (State Board) ordered (WQ 90-5) the Discharger implement actions to limit flows that exceed 120 million gallons per day (mgd) of dry weather effluent flow or flows that would not further impact rare and endangered species.
5. In 1991, the Discharger proposed the South Bay Action Plan (SBAP) to comply with WQ 90-5. The SBAP included implementation of the South Bay Water Recycling program to reduce flows discharged to the Bay during dry weather. The 1991 SBAP also included streamflow enhancement projects, like the one proposed in this Amendment, for study. The Regional Board approved the SBAP with Resolution No. 91-152.

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6. In 1992, the Discharger certified an EIR for the South Bay Water Recycling program. The EIR included streamflow augmentation.
7. On May 28, 1997 the Discharger submitted the Revised South Bay Action Plan (RSBAP) to the Regional Board. The SBAP proposed both near and long-term solutions to reduce the discharge. The Revised South Bay Action Plan included streamflow augmentation as a pilot project. These projects were proposed in addition to Phase I of the 1991 Action Plan, which the Discharger is currently implementing.
8. At its September 1997 meeting the Regional Board amended the Discharger's NPDES permit to implement the RSBAP (Board Order 97-111). The RSBAP includes 5 programs: Indoor Water Conservation; Expanded Water Recycling; Industrial Water Recycling/Reuse; Inflow/Infiltration Reduction; and Environmental Enhancements. The Coyote Creek Streamflow Augmentation Pilot Project was developed to implement an Environmental Enhancement project as approved by the Regional Board under Order 97-111.
9. Discharge from the Plant to Artesian Slough is regulated under waste discharge requirements and NPDES Permit No. CA0037842 (Order 98-052, adopted by the Regional Board on June 17, 1998), and recycled water reuse is regulated under waste discharge requirements in Water Reclamation Requirements Order 95-117. Order No. 98-052 specifies the current requirements for implementation of the Revised SBAP and includes as Provision E.3.1.P the task to implement Environmental Enhancement Projects by January 31, 2001.

PURPOSE OF ORDER

10. This NPDES permit amendment authorizes and regulates the pilot-scale streamflow augmentation discharge of treated wastewater at an alternate discharge location upstream to an existing 27-inch storm sewer along Singleton Road to Coyote Creek at latitude 37° 17' 47.8" and longitude 121° 49' 17.9", which enters that portion of San Francisco Bay lying south of the Dumbarton Bridge (hereinafter Lower South San Francisco Bay), all waters of the United States.

Project and Discharge Description

11. The Coyote Creek Streamflow Augmentation Pilot Project is an exploratory program designed to determine whether the release of recycled water into Coyote Creek during summer low-flow conditions can create and maintain stream conditions that enhance the aquatic environment and support coldwater fish species. Increased flows and cooler habitat conditions in Coyote Creek are expected to improve conditions for steelhead and Chinook salmon growth and survival. The planning of this project has involved the preparation of several technical documents that look at the feasibility and technical aspects of the project. These technical reports are:
 1. *Coyote Creek Streamflow Augmentation Program: Candidate Site Descriptions* (June 1999) documents the steps involved in selecting candidate sites for assembly and operation of the dechlorination/cooling facility;
 2. *Coyote Creek Streamflow Augmentation Program: Final Project Description* (March 2000) provides a concise description of the scope of the project both in terms of the basic layout of the

- plant and facilities required and the efforts that will be conducted to demonstrate the effectiveness of the initial pilot project;
3. *Coyote Creek Streamflow Augmentation Pilot Project: Final Water Quality Monitoring Report for July - October 1999* (April 2000) summarizes baseline conditions in Coyote Creek prior to release of recycled water including water quality and toxicity; and
 4. *Draft Coyote Creek Streamflow Augmentation Pilot Project: Initial Study/Mitigated Negative Declaration* (May 2000) addresses the environmental impacts of the construction and operation of the Streamflow Augmentation Pilot Project.
 12. The Coyote Creek Streamflow Augmentation Pilot Project is a seasonal 3-year demonstration study designed to better understand the environmental effects of using dechlorinated, cooled recycled water as a supplemental water supply for the enhancement and maintenance of the Coyote Creek ecosystem during the dry summer low-flow months. If the project is found to enhance the Coyote Creek environment, recycled water could be used to supplant future mandated reservoir releases and could be considered as an option for other degraded streams and rivers in the region.
 13. Facility. The Pilot Project Facility includes a connection to the South Bay Water Recycling (SBWR) transmission and distribution pipeline, a connection to an existing storm sewer for conveyance of cooled dechlorinated recycled water to Coyote Creek, and a connection to a sanitary sewer for discharge of water delivered to the site that does not meet permit requirements, plus dechlorination and cooling facilities. Approximately 2700 feet of SBWR pipeline will be extended to the facility site located within the confines of the former Singleton Landfill. Recycled water will be routed through a dechlorination facility, then through evaporative cooling towers, and as needed, through mechanical chillers to meet design discharge temperatures, then discharged to the adjacent storm drain and through outfall #219. The dechlorination facility is contained within a 45-foot steel shipping container and consists of a liquid sodium bisulfite storage tank, chemical feed system, electricity generation turbine (powered by recycled water pressure in the transmission pipeline), gasoline-powered backup generator, uninterruptable power supply battery, and an instrumentation and control system. The 27-inch storm drain pipe is located beneath Singleton Road, and recycled water flows approximately 500 feet from the dechlorination facility to the outfall on the west bank of the Coyote Creek channel.
 14. Flow. The Plant has a treatment capacity of 167 mgd average dry weather influent flow. Recycled water is supplied from the Plant to the discharge location by the South Bay Water Recycling transmission facilities, which have a total capacity of 50 mgd. The transmission pipeline discharge location has a capacity of 20 mgd. The dechlorination and cooling facilities located at the discharge location has a design capacity of up to 8 mgd.
 15. Water Temperature Requirements. Current Basin Plan criteria for temperature require that receiving water temperature not be altered unless it can be demonstrated that 1) such alteration will not affect the beneficial uses of the waterbody and 2) temperatures shall not be increased more than 5 °F (2.8 °C) above that of the natural receiving water.
 16. The Coyote Creek Streamflow Augmentation project is unique in that one of the benefits supported by the project is to provide habitat suitable to coldwater fishes, which

restrictive temperature requirements for spawning, hatching, and rearing. Several detailed analyses have been performed to assure that the recycled water being released into the creek is cool enough to meet these strict temperature requirements. The resultant cooling system has been designed so that, even during the most extreme atmospheric conditions, the maximum temperature thresholds of the fish will not be exceeded.

17. The facilities will be designed and operated to provide the following temperatures:

Release Temperatures °F

Month	Target	Maximum
May and October	57	60
June	65	68
July - September	68	71

To meet these temperature requirements, cooling equipment is required to reduce the temperature of the recycled water prior to discharge to Coyote Creek by an average of between 6 °F and 12 °F, depending on the month. During mid-summer months (June to September) the recycled water must be cooled an average of 6 °F, and up to 9 °F for ten percent of the month. May and October require the greatest cooling effort. The average temperature decrease required to meet the biological criteria is 10 °F in May and 12 °F in October. For ten percent of the time in October it will be necessary to cool the recycled water by more than 14 °F.

Provision E.1 of the permit requires development of a monitoring program. The discharger intends to work with stakeholders to develop a monitoring program. Consistent with the provision, it is the intent of the discharger to include continuous monitoring of the ambient water temperature and the temperature of the recycled water in the monitoring program.

18. Operation Period and Design Flows. The nominal operating period of the pilot project is from May 1 to October 31 at a stable flow rate in Coyote Creek of 8 mgd.
19. Contingency Plans. The City has identified a series of options that will provide adequate water supply in the event of an emergency reduction or outage. Groundwater wells, a 12-inch potable water line at the site and reservoir releases would provide supplemental water in case of an emergency. The City is committed to providing sufficient water to avoid adversely affecting salmonid fish in Coyote Creek.

PUBLIC PARTICIPATION AND CEQA

20. Stakeholders. The Discharger, as part of the development of this project, has held multiple public meetings and worked with multiple stakeholder groups. The Discharger has used the input from these meetings to develop operational and monitoring criteria acceptable to stakeholders and for inclusion in the required environmental documents. The public meetings have been held at multiple

convenient locations and at day and evening times to allow for maximum public participation. Public meetings for environmental enhancement projects began in April of 1998, with meetings on 4/3/98; 4/15/98; 4/27/98; 5/27/98; 6/19/98; 7/24/98; 8/27/98; 10/13/98; 11/30/98; 5/18/99; 6/8/00.

Stakeholder groups that have been represented at these meetings were Streams for Tomorrow, CLEAN South Bay, Guadalupe-Coyote Resource Conservation District, Santa Clara Valley Water District, California Department of Fish and Game, San Francisco Regional Water Quality Control Board, US Fish and Wildlife, Silichip Chinook, League of Women Voters, California Dept of Health Services, Santa Clara Valley Audubon Society, National Marine Fisheries Service, Silicon Valley Toxics Coalition, and Western Waters Canoe Club.

21. CEQA. The Discharger has complied with CEQA and adopted a mitigated Negative Declaration (ND), which by reference incorporates the 1992 South Bay Water Recycling EIR. The mitigated ND identifies project-specific impacts and incorporates monitoring and mitigation measures for the pilot streamflow augmentation project such that no significant adverse environmental impacts will occur.
22. The mitigated ND identified the elements of the biological monitoring program that would be conducted to document the overall performance of the streamflow augmentation program. Program performance was defined as the ability to meet design criteria, document permit compliance, and enhance aquatic habitat and use of the creek by biota.
23. The major elements of the monitoring program outlined in the ND and associated technical reports address: surface and groundwater quality, nutrients, benthic invertebrates, steelhead and chinook salmon fish monitoring, attraction flows, resident fish populations (including potential impacts on fish from endocrine disruptor compounds), and duckweed, emergent, and periphyton aquatic vegetation growths. The Provisions require the discharger to develop detailed monitoring workplans for each of these elements for review and approval by the Executive Officer in advance of start-up of the pilot project.
24. The Coyote Creek Streamflow Augmentation Project would help implement actions for water reuse and aquatic resource improvements contained in the Comprehensive Conservation and Management Plan, adopted by the San Francisco Estuary Project in March 1993.

BASIN PLAN

25. Basin Plan. The Board adopted a revised Water Quality Control Plan for the San Francisco Bay Basin (hereinafter the "Basin Plan") on June 21, 1995. This updated and consolidated plan represents the Board's master water quality control planning document. The revised Basin Plan was approved by the State Water Resources Control Board (SWRCB) and the Office of Administrative Law on July 20, 1995 and November 13, 1995, respectively. The Basin Plan identifies beneficial uses and water quality objectives for waters of the state in the Region, including surface waters and groundwaters. The Basin Plan also identifies effluent limitations and discharge prohibitions intended to protect beneficial uses. This Order is consistent with the plans, policies and provisions of the Board's Basin Plan.
26. CTR/SIP. The California Toxics Rule (CTR) was promulgated as final on May 18, 2000 by USEPA, establishing numeric water quality objectives for the first time for the Lower South Bay. The State

Implementation Plan (SIP) was approved by the SWRCB and OAL March 2, 2000 defining how CTR values were to be implemented in establishing effluent limitations.

27. Beneficial Uses. The existing and potential beneficial uses of Coyote Creek recognized in the Basin Plan are:

- Cold Freshwater Habitat
- Fish Migration
- Preservation of Rare and Endangered Species
- Water Contact Recreation (potential)
- Noncontact Water Recreation
- Fish Spawning
- Warm Freshwater Habitat
- Wildlife Habitat

Steelhead trout reproduce in tributaries of Coyote Creek and use the mainstem of Coyote Creek for migration passage and juvenile rearing, and steelhead trout have been protected as threatened under the federal Endangered Species Act since the last Basin Plan update. Chinook salmon (also protected as a candidate species) are known to also migrate into and spawn in Coyote Creek.

28. Downstream Beneficial Uses. The beneficial uses of San Francisco Bay, South Bay (south of the Dumbarton Bridge) and contiguous water bodies are:

- Ocean, Commercial, and Sport Fishing
- Estuarine Habitat
- Industrial Service Supply
- Fish Migration
- Navigation
- Preservation of Rare and Endangered Species
- Water Contact Recreation
- Noncontact Water Recreation
- Shellfish Harvesting
- Fish Spawning (potential use)
- Wildlife Habitat

28. Discharge Prohibitions. The discharge location is contrary to the State Water Resources Control Board Bays and Estuaries Policy (1974), which prohibits discharges south of the Dumbarton Bridge and to one of the Discharge Prohibitions identified in the Basin Plan. The 1995 Basin Plan states, in part (Table 4-1):

"It shall be prohibited to discharge:

1. *Any wastewater which has particular characteristics of concern to beneficial uses at any point at which the wastewater does not receive a minimum initial dilution of at least 10:1, or into any non-tidal water, dead-end slough, similar confined waters, or any immediate tributary thereof."*

29. Prohibition Exceptions. The Basin Plan states (at page 4-5) that exceptions to the above prohibitions will be considered for discharges where:

- "a. An inordinate burden would be placed on the Discharger relative to the beneficial uses protected and an equivalent level of environmental protection can be achieved by alternate means, such as an alternative discharge site, a higher level of treatment, and/or improved treatment reliability; or*
- b. A discharge is approved as part of a reclamation project; or*
- c. It can be demonstrated that net environmental benefits will be derived as a result of the discharge."*

30. Plant Reliability Consideration. The Basin Plan further states (at page 4-5) that:

"In reviewing requests for exceptions, the Regional Board will consider the reliability of the Discharger's system in preventing inadequately treated wastewater from being discharged to the receiving water and the environmental consequences of such discharges."

The Plant provides a high level of treatment and the pilot streamflow augmentation project provides an equivalent level of environmental protection relative to discharge of the pilot project flows at the Artesian Slough discharge location. The pilot streamflow augmentation has been evaluated using all feasible scientific evaluation approaches to identify the potential for beneficial and adverse environmental impacts. This Order allows a pilot streamflow augmentation project to be implemented to further evaluate the environmental benefits of streamflow augmentation. This Order provides for immediate cessation of discharge if particular environmental impact criteria are met.

31. Reclamation Project. The discharge is part of the South Bay Water Recycling Program.

32. Net Environmental Benefit. The Coyote Creek Streamflow Augmentation Pilot Project provides a net environmental benefit by providing flows that have consistently good water quality during summer low-flow ambient creek conditions. The augmented flows will:

1. Flush pooled contaminants from the creek,
2. Improve overall water quality by diluting existing creek toxicants (e.g., pathogens and metals),
3. Provide cool flowing water that will produce a habitat found attractive by coldwater fishes for migration, spawning, and nursery purposes,
4. Provide acceptable habitat for endangered and protected salmonid species,
5. Provide consistently flowing water that will provide attractive habitat for benthic macroinvertebrates and wildlife,
6. Improve aesthetics by diluting and flushing pollutants downstream, making it more attractive for water recreation, and

7. Reduce riparian dry-out and mortality caused by summer low-flow creek conditions and enhance the riparian corridor.

These conditions and resultant environmental benefits of releasing recycled water into Coyote Creek are sufficient to grant an exemption from the Basin Plan 10:1 dilution prohibition.

33. The proposed project, as part of the Board approved SBAP, was designed to address salt marsh conversion in both short-term and long-term ways. The short-term goals were to move water upstream and release it into the Creek, anticipating some loss to evaporation. It is also anticipated that this small amount of flow will not, by itself, impact the salt marsh at the mouth of Coyote Creek. Coyote Creek currently carries this amount of flow during dry weather months with no documented impact to the salt marsh.
34. Long-term ways of addressing the salt marsh conversion issue are the advancement of the state of knowledge concerning recycled water and its use as a water supply for fish and wildlife. Understanding and developing the use of recycled water for future applications can potentially reduce the amount of water that is ultimately released to the south bay salt marshes.

BASIS FOR PERMIT LIMITS

35. Basin Plan. The Basin Plan specifies water quality objectives for temperature, dissolved oxygen, pH, un-ionized ammonia, turbidity, and total dissolved solids. These objectives are incorporated in this Order as receiving water limits.
36. Reasonable Potential Analysis. Using the method described in the State Implementation Plan (SIP) the Discharger has performed a Reasonable Potential Analysis (RPA) to determine which constituents in the CTR require effluent limits in the City's permit amendment for Streamflow Augmentation in freshwater Coyote Creek. Until the CTR was adopted there were no water criteria in the Basin Plan applicable to the South Bay. The CTR/SIP based Reasonable Potential Analysis for the discharge to Coyote Creek found no constituents were detected between 1997 and 1999 at levels greater than the CTR freshwater criteria. The limits in Order 98-052 are as low or lower than water quality objectives for the protection of beneficial uses for all criteria that are applicable to the streamflow augmentation pilot project. Therefore, the existing Permit effluent limits for toxic substances are not repeated in this Order.

As specified in 40 CFR 122.44(d) (1) (i), permits are required to include limits for all pollutants "which the Director determines are or may be discharged at a level which will cause, have the reasonable potential to cause, or contribute to an excursion above any State water quality standard." Using the method described in the SIP, Regional Board staff and the discharger have analyzed the effluent data to determine if the discharges had reasonable potential to cause or contribute to an exceedance of a State water quality standard ("RP Analysis"). The RP analysis compares the effluent data with the Basin Plan, CTR, USEPA's NTR, 1998, and USEPA's Quality Criteria for Water, 1986 (Gold Book).

A complete RP analysis cannot be performed on the discharger's effluent because there is insufficient ambient, background data to determine if an effluent limitation is needed. In accordance with the SIP, the discharger shall obtain ambient, background water samples for metals and organic

priority pollutants upstream from the facility. After the background information is gathered, the RPA will be performed and the permit reopened to include applicable RP analysis results in the permit.

a. Reasonable Potential Determination The RP analysis involves identifying the observed maximum pollutant concentration in the effluent (MEC) for each constituent, based on the effluent concentration data for the past three years (1997 through 1999). If all of the sample results are nondetectable and the lowest detection limit is below the applicable criteria, the lowest detection limit is used as the MEC.

In accordance with the SIP, section 1.3, the RP analysis for all constituents is based on zero dilution. The lowest WQO is adjusted for pH, hardness and translator data. The Basin Plan WQOs in Table 3-3 and 3-4 do not apply south of the Dumbarton Bridge (page 3-5 of the Basin Plan). Therefore, the CTR criteria are the applicable criteria used in the RPA. The freshwater criterion maximum concentration (CMC), freshwater criterion continuous concentration (CCC) and human health criterion for consumption of organisms only in Table b (1) were used.

Freshwater aquatic life criteria for metals that were expressed as a function of 100 mg/L total hardness (cadmium, copper, chromium III, lead, nickel, silver and zinc) were adjusted for site specific hardness data. The Discharger sampled 7 sites in the receiving water during four different sampling events from July through October 1999. This study is documented in the *City of San Jose Environmental Enhancement Program Coyote Creek Streamflow Augmentation Pilot Project Final Water Quality Monitoring Report For July - October 1999* (April 2000). The average hardness values at the seven sites ranged from 202 - 383 ug/L and the minimum values ranged from 191 - 345 ug/L. The most conservative minimum hardness value of 191 ug/L, from the Helleys sampling location located upstream from the proposed discharge point, was used to adjust the CTR criteria.

The CTR criteria are expressed as dissolved criteria. The SIP allows the use of applicable conversion factors to express the criterion as total recoverable if a site-specific translator has been determined. For those constituents where an EPA conversion factor is not available, a conservative one to one conversion from dissolved to total criteria is assumed. Where applicable, freshwater acute criteria conversion factor was applied to the CMC and the freshwater criteria conversion factor was applied to the CCC. (The cadmium and lead conversion factors are also hardness dependant. The site specific hardness value of 191 ug/L was used to calculate cadmium and lead conversion factors.)

b. RPA Data and Analysis.

The 127 CTR constituents and tributyltin were analyzed. Although the majority (55 constituents) the organic MECs were below the lowest criteria, the RP analysis was considered because there were no ambient background concentration results to verify the results. Concentrations are below the water quality criteria.

Thirty of the constituents had no RP and no effluent limits are required.

Twenty seven constituents had incomplete RPAs because all of the results were not below the lowest detection limit was above the lowest criteria. The SIP requires additional

these constituents instead of a water quality based effluent limit. However, it should be noted that for these constituents current analytical methods can not achieve detection limits lower than the lowest criteria.

The remaining 16 constituents were considered incomplete RPAs because there was no effluent data and/or background data to complete the RPA.

37. Interim Effluent Limits. The RPA showed there were no constituents with RP that require interim effluent limits for the Pilot Streamflow Augmentation Project. The only effluent limits for toxic constituents that apply are the effluent limits in Order 98-052.
38. CEQA. This Order serves as an NPDES permit, issuance and reissuance of which is exempt from the provisions of Chapter 3 (commencing with Section 21100) of Division 13 of the Public Resources Code (CEQA) pursuant to Section 13389 of the California Code. In addition, the City of San Jose certified a mitigated Negative Declaration for this pilot project on September 27, 2000.5
39. Public Notice. The Discharger and interested agencies and persons have been notified of the Board's intent to reissue the NPDES permit for this discharge and have been provided an opportunity to submit their written comments and appear at the public hearing.
40. Public Hearing. The Board, at a properly noticed public meeting heard and considered comments pertaining to the discharge.

IT IS HEREBY ORDERED, that the Discharger, in order to meet the provisions contained in Division 7 of the California Water Code and regulations adopted thereunder and the provisions of the Clean Water Act as amended and regulations and guidelines adopted thereunder, shall comply with the following amendments to Order No. 98-052:

A. DISCHARGE PROHIBITIONS

1. The Discharger is granted an exception to discharge prohibitions 1 through 3 of Order No. 98-052 for discharge at the specified alternate discharge location in Coyote Creek for purposes of a pilot streamflow augmentation demonstration project, based on a finding of net environmental benefit, conditioned upon compliance with amended B. Effluent Limitations and E. Provisions below.

B. EFFLUENT LIMITATIONS

The term "effluent" in the following limitations means the treated wastewater effluent from the Discharger's wastewater treatment facility, as discharged to receiving waters. With the exception of chorine residual and temperature, attainment of all effluent limits shall be evaluated in Plant effluent per Order 98-052. Chlorine residual and temperature shall be measured at the point of discharge to Coyote Creek.

1. Temperature. At no time shall the discharge exceed the ambient creek temperature for a period exceeding 12 hours, unless the discharge is equal to or less than 60° F in May and October, 68° F in

June, 71° F in July through September. Target release temperatures¹ shall be 57° F in May and October, 65° F in June, and 68° F in July through September.

C. RECEIVING WATER LIMITATIONS

1. Temperature. The discharge shall not cause the receiving water temperature to increase by more than 5° F for more than one hour.
2. The discharge of waste shall not cause the following conditions to exist in waters of the State at any place:
 - A. Floating, suspended, or deposited macroscopic particulate matter, or foam;
 - B. Bottom deposits or aquatic growths;
 - C. Alteration of turbidity, or apparent color beyond present natural background levels;
 - D. Visible, floating, suspended, or deposited oil or other products of petroleum origin;
 - E. Toxic or other deleterious substances to be present in concentrations or quantities which will cause deleterious effects on aquatic biota, wildlife, or waterfowl, or which render any of these unfit for human consumption either at levels created in the receiving waters or as a result of biological concentration.
3. The discharge shall not cause the following limits to be exceeded in waters of the State:

Constituent	Limit
A. Dissolved Oxygen	7.0 mg/L minimum. Median of any three consecutive months shall not be less than 80% saturation. When natural factors cause lesser concentrations than those indicated above, then this discharge shall not cause further reduction in the concentration of dissolved oxygen.
B. Dissolved Sulfide	0.1 mg/L maximum.
C. pH	pH shall not be depressed below 6.5 nor raised above 8.5. The discharge shall not cause a pH change that is 0.5 greater than normally occurs.
D. Un-ionized Ammonia	0.025 mg/L as N, annual median. 0.4 mg/L as N, maximum.

¹ For the purpose of this pilot project the target release temperatures are considered a design and operational factor and not an enforceable effluent limitation. The Discharger shall take all reasonable actions to return operating temperatures to the target numbers during any excursion above these values.

E. Turbidity	Waters shall be free of changes in turbidity that cause nuisance or adversely affect beneficial uses. Turbidity changes that result in greater than a 10 percent light penetration increase are prohibited where natural turbidity is greater than 50 NTU.
F. Salinity (TDS)	The Discharge shall not cause salinity conditions in Coyote Creek or Alviso Slough that adversely impact beneficial uses, particularly fish migration and reproduction, and estuarine habitat.

4. If applicable water quality standards are promulgated or approved pursuant to Section 303 of the Clean Water Act, or amendments thereto that supersede the basis for this permit, the Regional Board will revise or modify this Order in accordance with the applicable objectives and implementation policies established by the State Board.

E. PROVISIONS

1. **Monitoring Program.** The Coyote Creek Streamflow Augmentation Project requires a monitoring program that is designed to assess whether or not the stated project objectives are being met. The Discharger shall work with stakeholders through the Santa Clara Basin Watershed Management Initiative and the Regional Board staff to obtain their approval and finalization of a monitoring program acceptable to the Executive Officer addressing the elements described in Finding 23 prior to initiating release of recycled water into Coyote Creek. Three types of monitoring shall be conducted:

Continuous in situ field measurements to monitor the effectiveness of the design, operation, and maintenance of the Proposed Project. Hydrologic, water quality, and meteorological parameters will be measured to compare design and operational characteristics and provide real-time data on potential acute effects on biota (e.g., changes in temperature or water quality that are deleterious).

Field sampling events to document the effectiveness of the Proposed Project. Field surveys will be conducted at selected locations before implementing the project and at regular intervals (monthly during the operational period) during the course of the project. The objective of this sampling will be to document the long-term effects of the project. Seven sites were selected and dry-down monitoring commenced in July 1999 to establish baseline creek water quality conditions.

Sampling within the immediate study area and at other locations to provide data that will be used in the Proposed Project with the Fisheries and Aquatic Habitat Collaborative Effort (FAHCE) and the Santa Clara basin watershed activities. The monitoring plan needs to be coordinated and dry-down contingency plan from Provision E.2. and with requirements of Provisions E.5 and E.6.

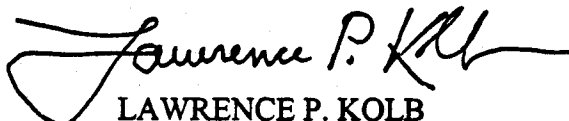
2. The Coyote Creek Streamflow Augmentation Project requires a written contingency plan that states that in the event that any facilities malfunction, backup systems would be maintained to ensure continuation of project releases deemed essential to the well being of the fish and wildlife dependent on the discharge. The Discharger has identified a series of groundwater wells

the proximity of the release location that could be used as a backup water supply in the unlikely event of a long-term plant failure or malfunction. In addition, the 12-inch potable water line at the proposed release point near the Singleton Landfill could supply approximately 2 mgd of water to supplement the emergency supply from the wells. It is likely that the potable water would have to be processed through the dechlorination station to remove the residual chlorine concentration. In addition, the contingency plan must address criteria for ceasing discharge of recycled water to Coyote Creek. The Discharger shall submit a written contingency plan for Executive Officer review and approval prior to initiating release of recycled water into Coyote Creek. The contingency plan needs to be coordinated with the monitoring plan from Provision E.1. and with requirements of Provisions E.5 and E.6.

3. **Initiating Discharge.** Discharge may commence in the summer of 2001 at such time that the Executive Officer approves a Discharger certification that the dechlorination and cooling facilities are fully and reliably operational and conditions of E.1 and 2 are met. Discharge may commence in subsequent years as approved by the Executive Officer. The Executive Officer shall consider monitoring data and other information to determine that discharge will continue to provide a net environmental benefit.
4. **Establishing Discharge Rates.** The Discharger has conducted pre-discharge studies that identified the appropriate discharge rate for habitat enhancement. The discharge shall commence at a rate such that total streamflow is increased, and total streamflow could be increased thereafter until the target streamflow is achieved. Changes in discharge rates, such as during system startup or shutdown, would be accomplished by using a ramping rate (changes in streamflow over time) that avoids the potential for reducing flows so quickly that fish become stranded. Implementation is designed for ramping rates of 2 cfs per 8-hour period. Cooling operation will be started by allowing recycled water to flow through the cooling towers. Based on the discharge temperature from the cooling towers, the flow would either bypass the chillers (if the water is cool enough) or be diverted through the chillers to further reduce temperature to the target release temperature. However, when first starting, the flow would be diverted into the sanitary sewer system until the flow temperature is stabilized. When the desirable temperature is achieved, the cooled recycled water would be released to Coyote Creek at incremental increases in flow rates of 2 cfs per 8-hour period. Similarly, the shutdown of the flow from the cooling system will be accomplished in 2 cfs increments per 8-hour period. This rate of increase and decrease of the release to the stream would allow time for fish and wildlife to move to or from the stream edges or the preferred habitat depths.
5. **Immediate Monitoring Data Review.** In the first two years of project operation, data from the self-monitoring program shall be evaluated periodically from the time discharge is initiated until one week after the target or maximum discharge rate is attained. Discharge shall be adjusted or ceased immediately as necessary if effluent limitations are not attained. The discharger shall, as part of the monitoring program in Provision E.1, develop an approach to report all monitoring data in a timely manner, especially effluent and receiving water temperature data that allows for timely decisions regarding cessation of the discharge. If discharge is ceased, the Executive Officer may approve resumption of discharge based on information that shows that beneficial uses will be protected and the above criteria for ceasing discharge are not expected to recur.

6. **Cease Discharge.** Discharge shall cease as described in E.2 and 5 above or when base flow (streamflow exclusive of recycled water discharge) returns to the target level after 31 October each year.
7. **Standard Provisions.** The Discharger shall comply with all items in the attached "Standard Provisions, Reporting Requirements, and Definitions" dated August 1993.
8. **NPDES Permit.** This Order shall serve as a National Pollutant Discharge Elimination System (NPDES) permit pursuant to Section 402 of the Clean Water Act or amendments thereto, and shall become effective 10 days after the date of its adoption provided the Regional Administrator, EPA, has no objection. If the Regional Administrator objects to its issuance, the permit shall not become effective until such objection is withdrawn.
9. **Order Expiration.** This Order expires on June 17, 2003. The Discharger must file a report of waste discharge in accordance with Title 23, Chapter 3, Subchapter 9 of the California Administrative Code not later than 180 days before this expiration date as application for reissuance of waste discharge requirements.

I, Lawrence P. Kolb, Acting Executive Officer, do hereby certify that the foregoing is a full, true, and correct copy of an order adopted by the California Regional Water Quality Control Board, San Francisco Bay Region, on October 18, 2000.



LAWRENCE P. KOLB
Acting Executive Officer

6. If the results of the monitoring required in Provision 2 above for Stations SB03, SB06, SB07, SB08, SB09, and SB10 show that mean dissolved nickel concentrations have risen to 8.0 ug/l, the Dischargers shall implement Phase 2 actions described in Finding 11 and report on the Phase 2 actions in the annual report required by Provision 1.
7. Provision 6 of Order No. 98-052, Provision 4 of Order No. 98-053, and Provision 5 of Order No. 98-054 are hereby amended to read as follows:

Watershed Management Initiative Support

The Discharger shall participate with the Regional Board staff, other Dischargers in the Lower South Bay, representatives of the public and other concerned parties as described below in carrying out the Santa Clara Basin Watershed Management Initiative (WMI) tasks set forth in a workplan to be approved by the Executive Officer to be developed pursuant to Provision 8 of this Order aimed at assisting the Regional Board select and adopt site-specific water quality objectives for copper and nickel. In addition to conducting the work set forth in Provision 8, the Discharger shall participate in such a manner by attending through its representatives meetings of the Core Group of the WMI, as well as meetings of the Bay Modeling and Monitoring Subgroup and the Regulatory Subgroup. The Discharger shall review and comment upon all technical and other proposals developed by the foregoing groups of the WMI that are related to surface water quality in the Lower South Bay. These technical proposals include, but are not limited to: Track and encourage investigations of uncertainties in the Lower South Bay impairment decision (CB-17); Track and encourage investigations on factors influencing copper and fate and transport (CB-18); and Copper Conceptual Model update (CB-20), from the Copper Action Plan; and Track and Encourage a watershed model linked to a process oriented Bay model (NB-7) from the Nickel Action Plan. The Discharger shall make technical information that is considered public information, in its possession available to the appropriate groups of the WMI necessary to develop and conduct the work effort set forth in the workplan required per Provision 8 of this order. The Discharger shall report to the Executive Officer every six months, beginning January 31, 2001 as part of the watershed program status update, describing its efforts for the prior six months in cooperating with the WMI. The Dischargers shall, in conjunction with the BMM and/or Regulatory Subgroups, schedule semi-annual (twice per year) meetings to discuss tracking efforts and specific efforts that could be undertaken to look for opportunities to encourage specific activities, assign responsibility to execute such encouragement activities, and report on the implementation of previously assigned activities.

8. Provision 7 of Order No. 98-052 is deleted in its entirety. A new Provision is hereby added to each Discharger's permit as follows:

Technical Assistance to Support the Adoption of Site-Specific Objectives for Copper and Nickel

In support of the WMI's overall goal of developing and implementing site-specific water quality objectives for copper and nickel in the Lower South Bay, the Discharger shall participate with the other POTW Dischargers in the Lower South Bay to conduct the following work to assist the regulatory community to make a final selection of final site-specific objectives for copper and nickel in the Lower South San Francisco Bay and to issue waste discharge requirements to the treatment plants discharging into the Lower South Bay based thereon:

Draft technical and environmental support documents (FED) and summaries thereof for consideration and potential adoption by the Regional Board which are sufficient to enable the Regional Board to select final site-specific objectives for both copper and nickel from within the respective ranges specified in Finding 7 of this Order.

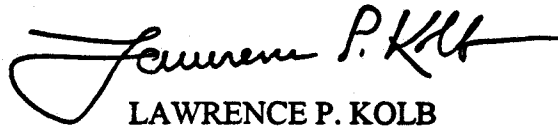
Draft analyses and plans as the Regional Board may need to consider and adopt pursuant to Sections 13241 and 13242 of the California Water Code, as appropriate to enable the Regional Board to comply with the requirements of such Sections in the adoption of site-specific objectives for copper and nickel.

Such further draft analyses and plans as the Regional Board may need to consider and adopt in order to comply with any other requirements of California law in order to adopt final site-specific objectives for copper and nickel and to issue waste discharge requirements to the treatment plants discharging into the Lower South Bay based on such objectives. Such further analyses and plans will be limited to the Regional Board's initial adoption of site specific objectives and waste discharge requirements and not for Regional Board actions in response to challenges of its determinations.

The Discharger shall develop and submit through the Bay Modeling and Monitoring Subgroup of the WMI a schedule and workplan, as part of an updated BMM workplan, to conduct the above work and prepare the above special studies that are acceptable to the Executive Officer within 60 days of adoption of this Order. Such workplan shall provide for a time schedule that will enable the Board to take final action to adopt the final site-specific objectives in as short a time as practicable, but in no case later than three (3) years from the date of adoption of the Order containing this Provision. Such workplan, when approved, shall become the workplan of the WMI. The Discharger shall report to the Executive Officer every six months, beginning July 31, 2001 as part of the watershed program status update (or in the annual and semiannual Pretreatment Program Reports), describing its efforts for the prior six months.

9. As part of the report of waste discharge required 180 days prior to permit expiration for reissuance of the NPDES permits, the Dischargers shall submit revised Copper and Nickel Action Plans. The Plans shall be revised as necessary based on initial data collected and information gained from the initial implementation of the Plans.
10. This Order expires on June 17, 2003.

I, Lawrence P. Kolb, Acting Executive Officer, do hereby certify that the foregoing is a full, true, and correct copy of an order adopted by the California Regional Water Quality Control Board, San Francisco Bay Region, on October 18, 2000.

A handwritten signature in black ink, appearing to read "Lawrence P. Kolb", with a stylized, sweeping flourish at the end.

LAWRENCE P. KOLB
Acting Executive Officer

Appendix A
(Based on Table 4-1 of the Nickel Action Plan)
Summary of POTW Baseline Nickel Control Actions¹

Baseline Number	Copper Action Plan Reference	Description	Lead Party	Implementation Time-Frame	Implementation Mechanism	Source (s) addressed; potential effectiveness
NB-3	(Same as CB-13)	Track POTW Pretreatment Program efforts and POTW loadings	POTWs	Ongoing	POTW NPDES Permits (reporting part of Annual SMR and Pretreatment Program reports)	Tracking effort
NB-4	(Same as CB-14)	Track and encourage water recycling efforts	POTWs	Ongoing	Reporting through POTWs Annual Water Recycling report and/or Annual SMR	POTW; cost-benefits need to be evaluated as part of considering additional efforts
NB-6	(Same as CB-19)	Continue to promote industrial water use and reuse efficiency. These programs may include workshops, outreach, incentives, or audits.	POTWs	Ongoing	POTW Permits	Unknown
NB-7		Track and encourage a watershed model linked to a process oriented Bay model	POTWs/SCVURPPP	Ongoing	POTW & SCVURPPP Permits	NA (could allow for better evaluation of water quality changes related to actual/theoretical source reductions; the cost-benefits need to be evaluated as part of considering additional efforts)

¹ Annual Reports of NPDES permitted agencies (POTWs and SCVURPPP) will contain a summary of the status of all NAP items.

Appendix A (Based on Table 4-2 of the Nickel Action Plan) Summary of Potential POTW Phase I Nickel Control Measures				
Phase I Number (CAP Reference)	Description	Lead Party	Implementation Mechanism	Source (s) addressed; potential effectiveness
(I-7)	Develop Phase II Implementation Plan for POTW expansion of water recycling	POTWs – convene powers to be (see Finding 12 of the POTW permit amendment)	POTW Permits	POTW; cost-benefits need to be evaluated as part of considering additional efforts
(I-10)	Evaluate results of tracking industrial virtual closed-loop wastewater efficiency measures and develop potential actions	POTWs – convene powers to be (see Finding 12 of the POTW permit amendment)	POTW Permits	Unknown at current time
(I-11)	Develop Phase II Implementation Plan for POTW process optimization	POTWs – convene powers to be (see Finding 12 of the POTW permit amendment)	POTW Permits	Unknown at current time
NI-3	Develop a Phase I Plan including an evaluation of the results Baseline actions	RWQCB – convene powers to be (see Finding 12 of the POTW permit amendment)	CWC regulatory mechanisms	Unknown at current time

Appendix A
(Based on Table 4-2 of the Copper Action Plan)
Summary of Potential POTW Phase I Copper Control Actions

Phase I Number (Dialogue)	Description	Lead Party	Implementation Mechanism	Source (s) addressed; potential effectiveness
CI-3 (19)	Update and re-evaluate source identification (MCMP for copper) and prioritize sources based on effectiveness evaluation of future potential control actions. Prepare an implementation plan reflecting the priorities and implement agreed upon Phase I control actions.	RWQCB – convene powers to be (see Finding 12 of the POTW permit amendment)	NPDES permits and other CWC regulatory mechanisms	Unknown at current time
CI-4 (20)	Prepare and implement a Phase I plan for improved corrosion control based on evaluation of results of Baseline measures.	POTWs/SCVWD and other suppliers	POTW permits and other CWC regulatory mechanisms	Corrosion related copper; unknown at current time
CI-7 (36)	Develop Phase II Implementation Plan for POTW expansion of water recycling	POTWs	POTW Permits	POTW; cost-benefits need to be evaluated as part of considering additional efforts
CI-8	Evaluate and investigate important topics that influence uncertainty with LSB Impairment Decision <ul style="list-style-type: none"> Phytoplankton toxicity and movement (IAR Section 5.3.1) Sediment cycling Loading uncertainty 	SCBWM I – Core Group (Assistance via POTW and /SCVURPPP and Co-permittees)	Encourage and identify resources (coordinate with other efforts/investigations such as those of RMP, NOAA, USGS, etc)	NA (special studies)

<p>Appendix A (Based on Table 4-2 of the Copper Action Plan) Summary of Potential POTW Phase I Copper Control Actions</p>					
Phase I Number (Dialogue)	Description	Lead Party	Implementation Mechanism	Source (s) addressed; potential effectiveness	
CI-9	<p>Evaluate and investigate important Factors that Influence Copper Fate (Potential Reduction in Uncertainty is Moderate to High)¹</p> <ul style="list-style-type: none"> Investigate flushing time estimates for different wet weather conditions Investigate location of northern boundary condition Determine Cu-L1 and L2 complex concentrations <p>Investigate algal uptake/toxicity with competing metals</p>	SCBWM – Core Group (Assistance via POTW and /SCVURPPP and Co-permittees)	Encourage and identify resources (coordinate with other efforts/investigations such as those of RMP, NOAA, USGS, etc)	NA (special studies)	
CI-10	<p>Evaluate results of tracking industrial virtual closed-loop wastewater efficiency measures and develop potential actions. Prepare an implementation plan reflecting the priorities and implement agreed upon Phase I control actions.</p>	POTWs	POTW Permits	Unknown at current time	
CI-11	<p>Develop Phase II Implementation Plan for POTW process optimization</p>	POTWs	POTW Permits	Unknown at current time	

Appendix A
(Based on Table 4-2 of the Copper Action Plan)
Summary of Potential POTW Phase I Copper Control Actions

Phase I Number (Dialogue)	Description	Lead Party	Implementation Mechanism	Source (s) addressed; potential effectiveness
CI-12	Develop a Phase II Plan including a re-evaluation of Phase I actions	RWQCB – convene powers to be (see Finding 12 of the POTW permit amendment)	CWC regulatory mechanisms	Unknown at current time

1 See Table D “Task 1: Conceptual Model Report for Copper and Nickel in Lower South San Francisco Bay” final report, December 1999 (see Appendix 4-2).

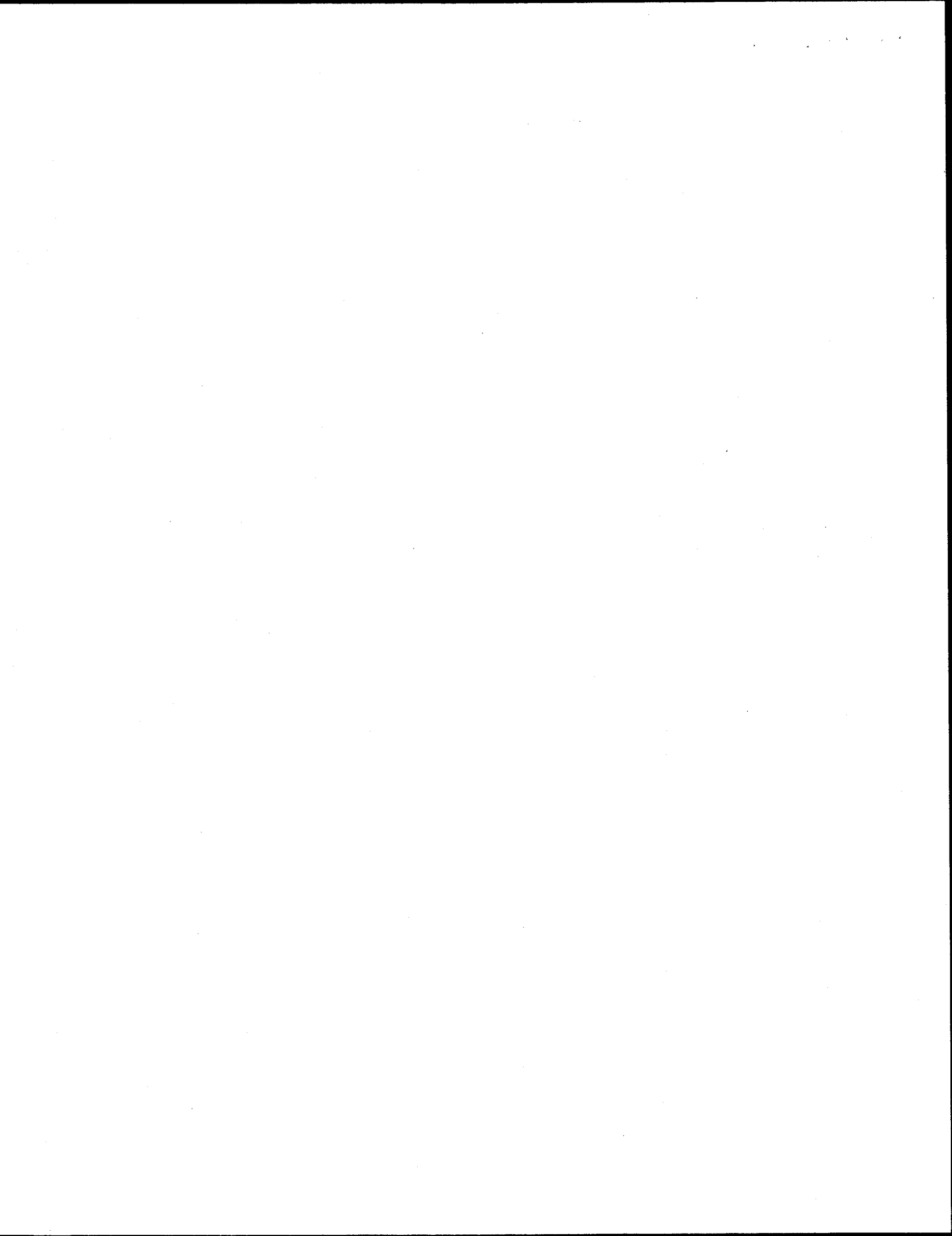
Appendix A (Based on Table 4-3 of the Copper Action Plan) Summary of POTW Phase II Copper Control Actions				
Phase II Number. (Dialogue)	Description	Lead Party	Implementation Mechanism	Source (s) addressed; potential effectiveness
CII-1 (12)	Reconsider usefulness of managing storm water through POTWs	POTWs (with assistance from SCVURPPP and Co- permittees)	CWC regulatory mechanisms	Unknown at current time
CII-3 (20)	Implement plan for additional corrosion control measures	POTWs/SCVWD and other suppliers	POTW permits and other CWC regulatory mechanisms	Corrosion related copper; unknown at current time
CII-6	Implement Phase II POTW process optimization measures	RWQCB –convene powers to be (see Finding 12 of the POTW permit amendment)	POTW permits	Unknown at current time; cost- effective and cost-benefit analysis required
CII-7	Implement agreed upon Phase II expansion of water recycling programs	RWQCB –convene powers to be (see Finding 12 of the POTW permit amendment)	POTW permits	Unknown at current time; cost- effective and cost-benefit analysis required

Appendix A
(Based on Table 4-1 of the Copper Action Plan)
Summary of POTW Baseline Copper Control Actions¹

Baseline Number (Dialogue)	Continuous Improvement/ Metals Control Plan	Description	Lead Party	Implementation Time-Frame	Implementation Mechanism	Source (s) addressed; potential effectiveness
CB-3 (11 & 35)	C-13 & C-35/ IND-1 & IND-2	Complete Industrial- 2: investigations (based on MCMP), identify and implement reasonable controls in conjunction with industry (older printed circuit board manufacturers with copper plating) to reduce elevated levels in runoff from targeted industry including development/implementation of education and outreach plan Clarify linkage with POTW Pretreatment Programs	SCVURPPP & Co-permittees & industry Possibly POTW permits (clarify need by March 2001 as part of SCVURPPP Work Plan)	Complete IND-2 Technical Report – August 2000 Conduct Pilot Outreach Campaign FY99-00 & 00-01 (4/13/00 Work Plan scope)	Urban Runoff and Industrial Storm water Permits Reporting conducted as part of SCVURPPP and Co-permittees Annual Report. (SCVURPPP and Co-permittee FY 99-00 Work Plan contains Industrial-2 scope. Future Work Plans will contain description of additional tasks based on Industrial-2 results.) Develop approach to implement Area-Wide as part of March 2001 Work Plan (tied to Pilot Results)	Address portion of industrial load; very small (<1-2% of copper from urban runoff)
CB-9 (20)	-----	Continue current efforts and track corrosion control opportunities: <ul style="list-style-type: none"> Continue educational outreach, within the City of Palo Alto, to plumbers and designers to reduce corrosion of copper pipes via better design and installation Track developments in (a) alternatives to copper piping (b) corrosion 	City of Palo Alto Environmental Compliance Unit (track and report developments to the SCBWMU)	Ongoing (start reporting as part of 2000 Annual Report)	POTW permit Reporting conducted as part of annual Pretreatment Program report.	Corrosion related copper; limited effectiveness

Appendix A
(Based on Table 4-1 of the Copper Action Plan)
Summary of POTW Baseline Copper Control Actions¹

Baseline Number (Dialogue)	Continuous Improvement/ Metals Control Plan	Description	Lead Party	Implementation Time-Frame	Implementation Mechanism	Source (s) addressed; potential effectiveness
		inhibitors, and (c) other methods of reducing copper corrosion				
CB-13 (35)	NA	Track POTW Pretreatment Program efforts and POTW loadings	POTWs	Ongoing	POTW NPDES Permits (reporting part of Annual SMR and Pretreatment Program reports)	Tracking effort
CB-14 (36)	NA	Track and encourage water recycling efforts	POTWs	Ongoing	Reporting through POTWs Annual Water Recycling report and/or Annual SMR	POTW; cost-benefits need to be evaluated as part of considering additional efforts
CB-17	NA	Track and encourage investigation of several important topics that influence uncertainty with Lower South Bay Impairment Decision ⁷ <ul style="list-style-type: none"> • Phytoplankton toxicity and movement (IAR Section 5.3.1) • Sediment cycling • Loading uncertainty Encourage incorporation of appropriate bioassessment tools into ongoing monitoring programs to track presence of copper-sensitive taxa in LSR.	SCBWM – Core Group (assistance via POTW and SCVURPPP and Co-permittees)		Track and encourage RMP, NOAA, USGS, etc.	NA (Special Studies)



Appendix A
(Based on Table 4-1 of the Copper Action Plan)
Summary of POTW Baseline Copper Control Actions¹

Baseline Number (Dialogue)	Continuos Improvement/ Metals Control Plan	Description	Lead Party	Implementation Time-Frame	Implementation Mechanism	Source (s) addressed; potential effectiveness
		copper-sensitive taxa in LSB. Prepare issue paper on feasibility and cost of addressing phytoplankton toxicity questions	RWQCB (Tom Mumley)			
CB-18	NA	Track and encourage investigation of important Factors that Influence Copper and Fate (Potential Reduction in Uncertainty is Moderate to High) ² <ul style="list-style-type: none"> Investigate flushing time estimates for different wet weather conditions Investigate location of northern boundary condition Determine Cu-L1 and L2 complex concentrations Investigate algal uptake/toxicity with competing metals 	SCBWM1 – Core Group (assistance via POTW and SCVURPPP and Co-permittees)		Track and encourage RMP, NOAA, USGS, etc.	NA (Special Studies)
CB-19	NA	Continue to promote industrial water use and reuse efficiency. These programs may include workshops, outreach, incentives, or audits. (see Appendix 4-I#35)	POTW's	Ongoing	POTW Permits	Unknown



BMM/Reg Subgroup
 Approved for Transmittal to RWQCB on July 27, 2000
 Final Revision made by BMM/RS August 23, 2000
 Appendix A - prepared to reflect only POTW Control Actions
 (Includes Urban Runoff Permit Re-issuance Work Group Input)

Appendix A
(Based on Table 4-1 of the Copper Action Plan)
Summary of POTW Baseline Copper Control Actions¹

Baseline Number (Dialogue)	Continuous Improvement/ Metals Control Plan	Description	Lead Party	Implementation Time-Frame	Implementation Mechanism	Source (s) addressed; potential effectiveness
CB-20	-----	Revise Copper Conceptual Model report findings and produce status report (revise conceptual model uncertainty table, appendix ____ based on available information)	SCBWM (with assistance from POTW's and SCVURPPP & Co-permittees)	Permit Application	CORE GROUP short-term issue Update as part of NPDES Permit application process Possible linkage and assistance from North Bay effort as well as RMP and RWQCB TMDL efforts	Unknown

- ¹ Annual Reports of NPDES permitted agencies (POTW's and SCVURPPP) will contain a summary of the status of all CAP items.
² See Table D "Task 1: Conceptual Model Report for Copper and Nickel in Lower South San Francisco Bay" final report, December 1999 Contained in Appendix 4-2.

